

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MINALEAH A. KOFFRON,
Plaintiff,

Civil Action No. 23-0168-CD
Hon. Curtis J. Bell

v.

District Court Case No: _____

PORTAGE PUBLIC SCHOOLS,
MARK BIELANG, Superintendent and
NATHAN A. LEDLOW, Interim Principal
Of Portage Northern High School (in
their individual and governmental capacities).

Defendants.

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NOTICE OF REMOVAL OF CIVIL ACTION

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN:

NOW COME defendants, Portage Public Schools, Mark Bielang and Nathan A. Ledlow, and for their Notice of Removal, pursuant to 28 U.S.C. § 1446, respectfully show as follows:

1. On or about March 27, 2023, plaintiffs commenced an action against these defendants in the Circuit Court for the County of Kalamazoo, State of Michigan, entitled *Minaleah A. Koffron v Portage Public Schools, Mark Bielang, Superintendent*

and Nathan A. Ledlow, Interim Principal of Portage Northern High School, (in their individual and governmental capacities), and bearing Case No: 23-0168-CD and assigned to the Honorable Curtis J. Bell. A copy of the Complaint and other pleadings filed in these proceedings by plaintiff are attached hereto. These defendants have not filed an Answer to plaintiff's Complaint.

2. Plaintiff's Complaint alleges in Count III that defendants have violated plaintiff's federal constitutional rights set forth in the First Amendment of the United States Constitution applicable to the states through the 14th Amendment.

3. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over plaintiffs' claim asserting violations of the First and Fourteen Amendments to the United States Constitution. As a result, these defendants may remove plaintiff's entire Complaint to this Court pursuant to 28 U.S.C. § 1441(a), (b) and (c).

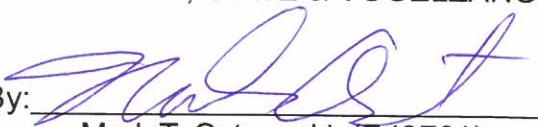
4. These defendants have filed this Notice of Removal within 30 days after defendants' first receipt of plaintiff's Complaint. There are no non-school district defendants not represented by the undersigned counsel.

WHEREFORE, the removing parties pray that the above-entitled action be removed from the Kalamazoo County Circuit Court to this Court.

KLUCZYNSKI, GIRTZ & VOGLZANG

Date: March 30, 2023

By:



Mark T. Ostrowski (P49761)

Attorneys for Defendants

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